

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AUG 11 2004

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MARGO MCMAHON,
Plaintiff

v.

NORTHWEST AIRLINES,
Defendant

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C.A. #
04 - 30141 - KPN
COMPLAINT
AND REQUEST FOR JURY TRIAL

FILING FEE PAID:

RECEIPT # 305685
AMOUNT \$ 150.00
BY DPTY CLK MLH
DATE 8/4/04

PARTIES

1. Plaintiff, Margo McMahon, is a natural person with a residence located at 34 Pomeroy Lane, Apt. No. 24, Amherst, Massachusetts 01002.
2. Defendant, Northwest Airlines, is a Minnesota corporation with a principal place of business at Department A4060, 2700 Lone Oak Parkway, Eagan, Minnesota 55121.

JURISDICTION AND VENUE

3. Jurisdiction in this case is based upon diversity of citizenship Title 28 USC Sec. 1332. The amount in controversy exceeds \$75,000.00. Venue in this Western Section of this is proper as the Plaintiff resides in Hampshire County, Massachusetts and the Defendant is a corporation subject to personal jurisdiction in this District.

COUNT ONE

4. On or about August 9, 2003, the Plaintiff was in the Minneapolis, St. Paul Airport preparing to embark on a Northwest Airlines flight to Hartford, Connecticut. As she was summoned to a Northwest Airlines Ticket Counter, the front wheels of her wheelchair dropped into a gap in a mat covering on the floor. This abruptly stopped her wheelchair's forward momentum and catapulted her from her wheelchair.

5. As a direct and proximate cause of Northwest Airlines negligent, careless and reckless maintenance of approach paths to its ticket counter, Margo McMahon was caused to suffer severe bodily injury, prevented from transacting her usual business for a long period of time, suffered great pain of both body and mind, and incurred great expense for medical attention and hospitalization.

WHEREFORE, Plaintiff, Margo McMahon, demands judgment against the Defendant, Northwest Airlines, in the amount of Ten Million Dollars, together with interest and costs.

JURY DEMAND

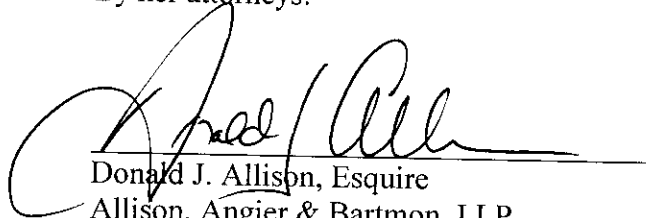
Pursuant to Fed. R. Civ. P. 38(b) and Amendment XII of the U.S. Constitution, Plaintiff demands a trial by jury on all claims.

MARGO MCMAHON

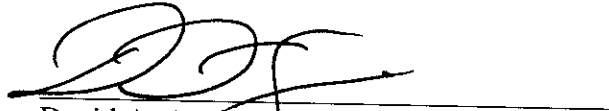
By her attorneys:

Dated

August 4, 2004

A handwritten signature in black ink, appearing to read "Donald J. Allison", written over a horizontal line.

Donald J. Allison, Esquire
Allison, Angier & Bartmon, LLP
69 South Pleasant Street, Suite 201
Amherst, MA 01002
413-256-0201
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A handwritten signature in black ink, appearing to read "David A. Angier", written over a horizontal line.

David A. Angier, Esquire
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